

Hood Canal Coordinating Council

JEFFERSON, KITSAP & MASON COUNTIES;
PORT GAMBLE S'KLALLAM & SKOKOMISH TRIBES
STATE & FEDERAL AGENCIES

3 February 2012

Puget Sound Partnership
326 E D Street
Tacoma, WA 98421

Dear Puget Sound Partnership:

On behalf of the Hood Canal Coordinating Council (HCCC) we provide the following comments on the Puget Sound Action Agenda Update, dated December 9, 2011:

Thank you for this opportunity to provide comments on the Action Agenda Update. We applaud the Partnership for the effort and thought applied in developing this AA Update. Partnership staff has been exceptional to work with and we look forward to continuing that strong relationship that has been fostered as we advance regional efforts to protect and restore the health of the Hood Canal Action Area.

We recognize, and we believe you do as well, that existing programs are important and should be considered in the mix of available future funding and how they fit in the context of Puget Sound recovery. In this Action Agenda Update, however, we welcome the attempt to “tee-up” a robust list of near-term actions that reflects new knowledge, new ideas, and the need to go beyond our current efforts to address critical pressures.

The current updating of the Action Agenda and associated comment period has allowed for a great opportunity to engage with our Hood Canal community partners in an exchange of information and ideas to address what threatens Hood Canal. Your process has sharpened the focus on these critical issues and mobilized community involvement. Through our Integrated Watershed Management Plan (IWMP) approach we have been working closely with our partners and their comments reflect the direction and guidance of the IWMP and goals established for the Hood Canal Action Area. As the Local Integrating Organization (LIO), we recognize that more work is needed with our partners to further develop and incorporate recommendations into the IWMP and the Action Agenda over the next couple of months. We will use all comments that pertain, to refine the local Hood Canal near term actions (NTAs). As together we get a better handle on the breadth, depth, and scope of the comments, we will want to be involved in editing and updating the local Hood Canal profile and will work with Partnership staff to accomplish this task. We

also seek to understand how the regional Puget Sound NTAs will support these local NTAs.

The Action Agenda Update presents over 150 NTAs. We suspect that the number will grow as a result of this review and comment period. Given the scale and extent of the NTAs, there is still a need to refine and prioritize the actions to match available funding, capacity, knowledge and skills. We want to understand how the prioritization of actions will be developed? Through the development of this current update to the Action Agenda, we hope to work with Partnership staff to see how the regional strategies and NTAs for all of Puget Sound can be integrated with and support local priorities and strategies. We also expect that funding of eventual actions will result from a competitive process that considers local priorities.

Specifically we would like to address the following topics:

We do not consider the In Lieu Fee Compensatory Mitigation program for the Hood Canal watershed as only a pilot as described in the Action Agenda on page 82. The Hood Canal ILF is intended to be a permanent tool available for our Hood Canal jurisdictions that allows for mitigation to occur, when necessary, that supports recovery and restoration of the Hood Canal landscape. We expect the Final Instrument for the program to be completed in June 2012 (not March 2012). The Action Agenda in section A7.3 states there are no NTAs identified for compensatory mitigation tools. We believe, however, that the NTA for the Hood Canal ILF program to be included in the Action Agenda update should consider that once the Final Instrument is complete we will be working in earnest with our partners, including the Puget Sound Partnership to apply the tools and assessments in the selection of appropriate mitigation projects that meet the goals and objectives for the Hood Canal Action Area.

Strategy C2 focuses on urban stormwater runoff; however, the stormwater challenges described in this section are not limited to urban basins. In particular, Strategy C2.1 focuses on maintaining stream health in locations where streams have “excellent” biotic integrity scores. These streams, with excellent biotic health, are for the most part not located in urban settings. In order to maintain the health of these systems, the stormwater strategies should be expanded to include a rural focus as well.

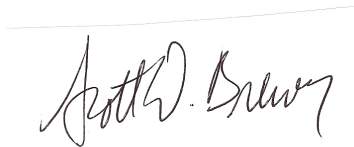
The target view on dissolved oxygen in marine waters should include some additional strategies and sub-strategies to address dissolved oxygen more comprehensively, including the following:

- Prevent or reduce nutrients from decentralized wastewater treatment, including reference to the work by the Department of Health to develop and OSS nitrogen reduction technology.
- Address nitrogen from alder forests.
- Include mitigation strategies to identify ways to lessen the impacts of eutrophication.

In Section C11.1 "Complete TMDL studies and other necessary water cleanup plans for Puget Sound to set pollution discharge limits and determine response strategies to address water quality impairments" consider adding to the list of "Key Ongoing Program Activities" that the *Hood Canal Aquatic Rehabilitation Program* is working to address the human contributions to low dissolved oxygen problems in Hood Canal, using the scientific findings from the Hood Canal Dissolved Oxygen Program and others, to develop and advance corrective actions.

Please add *Lower Hood Canal Watershed Coalition* to the Hood Canal Action Area partners list.

Sincerely,

A handwritten signature in black ink, reading "Scott D. Brewer". The signature is written in a cursive style with a horizontal line above it.

Scott Brewer
Executive Director
Hood Canal Coordinating Council

cc: HCCC Board
Dan O'Neal
Teri King